

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:) CHAPTER 11
)
TERI G. GALARDI,)
) CASE NO. 22-50035-JPS
Debtor,)
_____)

**DEBTOR’S LIMITED OBJECTION AND RESERVATION OF RIGHTS AS TO
SECOND INTERIM APPLICATION FOR CHAPTER 11 COMPENSATION OF THE
ATTORNEYS REPRESENTING THE COMMITTEE OF UNSECURED CREDITORS**

COMES NOW, Teri G. Galardi, Debtor and Debtor-in-Possession, in the above styled case proceeding under Chapter 11 of the Bankruptcy Code and files her Debtor’s Objection and Reservation of Rights as to the Second Interim Application for Chapter 11 Compensation of The Attorneys Representing The Committee of Unsecured Creditors (the “Second Application”) [Docket No. 209] filed on October 12, 2022. In support, Debtor respectfully shows the Court the following:

1.

On October 12, 2022, Counsel for the Committee of Unsecured Creditors filed its Second Application. A substantial part of the compensation sought relates to the Plan of Liquidation filed by the Committee of Unsecured Creditors on September 28, 2022 (the “Committee’s Plan”) [Docket No. 198]. The Committee’s Plan is unconfirmable on its face as it fails to treat the IRS claim for the Estate Tax liability of the Debtor as a secured claim as required by IRC 26 U.S. § 6324.

2.

Debtor objects to the payment of the fees requested by counsel for the Committee for preparation of the Plan and its accompanying Disclosure Statement, as filed, and requests this

Court refrain from awarding such fees related to the preparation of the Committee's Plan, at this time, but to wait for further developments in this Chapter 11 Case. While Debtor is prepared to fully brief its objections to the Second Application, Debtor believes the better course of action would be for the parties to discuss the issues and if needed mediate the dispute prior to any final ruling by this Court. Also, Debtor notes this Second Application is interim and no award would be final until such "final" application is presented. Accordingly, Debtor reserves all rights to more fully object to the Second Application at any hearing on a final application.

Respectfully submitted,

McBRYAN, LLC

/s/Louis G. McBryan

Louis G. McBryan, Georgia Bar No. 480993
6849 Peachtree Dunwoody Rd
Building B-3, Suite 100
Atlanta, GA 30328
Telephone (678) 733-9322
lmcbryan@mcbryanlaw.com
Attorneys for Debtor

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

IN RE:)	CHAPTER 11
)	
TERI G. GALARDI,)	
)	CASE NO. 22-50035-JPS
Debtor,)	
_____)	

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing **Debtor's Limited Objection And Reservation Of Rights As To Second Interim Application For Chapter 11 Compensation Of The Attorneys Representing The Committee Of Unsecured Creditors**, using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of and an accompanying link to the following parties in this case under the Bankruptcy Court's Electronic Case Filing Program:

The following parties were served by electronic notice:

Evan Owens Durkovic	ecfgamb@aldridgepate.com , edurkovic@ecf.courtdrive.com
Robert G. Fenimore	robert.g.fenimore@usdoj.gov , Ustp.region21.mc.ecf@usdoj.gov
Elizabeth A. Hardy	elizabeth.a.hardy@usdoj.gov , Ustp.region21.mc.ecf@usdoj.gov , elizabeth.hardy.collins@usdoj.gov
Leon Strickland Jones	ljones@joneswalden.com , arich@joneswalden.com , lpitts@joneswalden.com , ewooden@joneswalden.com , cparker@joneswalden.com , jwdistribution@joneswalden.com kdd@fbglaw.com
Roy E. Manoll, III	GA69@ecfcbis.com , rmtrusteenotices@akin-webster.com
Robert M. Matson	tmccclendon@joneswalden.com
Thomas McClendon	Ustp.region21.mc.ecf@usdoj.gov
U.S. Trustee – MAC	wstone@stoneandbaxter.com , mbelflower@stoneandbaxter.com , lford-faherty@stoneandbaxter.com , mcathey@stoneandbaxter.com , dbury@stoneandbaxter.com
Ward Stone, Jr.	jsilver@kklaw.com
James D. Silver	adudleylaw@gmail.com
Ainsworth G. Dudley	mutepe.akemon@richardslegal.com
Mutepe Akemon	wgeer@geerlawgroup.com , notices@nextchapterbk.com ;
William Bussell Geer	willgeer@ecf.courtdrive.com
Garrett A. Nail	gmail@pgnlaw.com
Christopher W. Terry	chris@boytererry.com , terrycr40028@notify.bestcase.com
Whitney Groff	wgroff@law.ga.gov
Jonathan D. Loegel	jloegel@law.ga.gov

Creditors Committee:

Shadana Deleston c/o Mutepe Akemon, Esq., as Proxy Holder

mutepe.akemon@richardslegal.com

Abrey Leahong c/o Mutepe Akemon, Esq., as Proxy Holder

mutepe.akemon@richardslegal.com

Addie Brooks c/o Ainsworth Dudley, Esq., as Proxy Holder

adudleylaw@gmail.com

The following parties were served by placing a copy of same in a properly addressed envelope with adequate postage affixed thereon via U.S. Mail:

Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

American Express
PO Box 981537
El Paso, TX 79998

Ag South Farm Credit
26 S. Main Street
Statesboro, GA 30458

Apple Card / Mastercard
P.O. Box 7247
Philadelphia, PA 19170

Business First Bank
1675 N. Hwy 190
Covington, LA 70433

Carlos V. Leach, Esq.
631 S. Orlando Avenue
Suite 300
Winter Park, FL 32789

Citibank Card
P. O. Box 20483
Kansas City, MO 64195

Cohen & Caproni
750 Hammond Drive
Building 7, Suite 200
Atlanta, GA 30328

ConServe
200 CrossKeys Office Park
Fairport, NY 14450

Darrell Galardi
263 N. Mulberry Street
Jackson, GA 30233

Discover Card
P.O. Box 30938
Salt Lake City, UT 84130

Disney Vacation Club
215 Celebration Place, Suite 300
Kissimmee, FL 34747

Fly Low, Inc.
506 SE 11th Street
Fort Lauderdale, FL 33316

Georgia Attorney General
40 Capitol Square, SW
Atlanta, GA 30334

Georgia Department of Revenue
PO Box 105499
Atlanta, GA 30348

Grace Gigi Galardi Trust
c/o Kelly Galardi, Trustee
2555 Chantilly Drive NE
Atlanta, GA 30324

Jackson Galardi Trust
c/o Kelly Galardi, Trustee
2555 Chantilly Drive NE
Atlanta, GA 30324

JEG Family Trust - Jack Galardi Jr
Sub-Trust
2121 Highland Avenue
Las Vegas, NV 89102

Michael Porter
2146 Highway 42 South
Flovilla, GA 30216

Power Financial Credit Union
2020 NW 150th Ave, Suite 100
Pembroke Pines, FL 33028

Southern States Bank
4045 Orchard Road SE, Suite 510
Smyrna, GA 30080

The Estate of Jack Galardi
c/o Teri Galardi, Executor
2146 Highway 42 South
Flovilla, GA 30216

Trinidad Creations, LLC
2121 Highland Ave
Las Vegas, NV 89102

Trop, Inc.
2555 Chantilly Drive NE
Atlanta, GA 30324

Yamilee Bennett
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Yashica Bain
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

U.S. Attorney's Office
Gateway Plaza
300 Mulberry Street, Suite 101
Macon, Georgia 31201

Internal Revenue Service
435 2nd Street
Macon, GA 31201

Georgia Department of Revenue
6055 Lakeside Commons Drive
Suite 220
Macon, GA 31210

Tiffany Thompson
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

U.S. Attorney's Office
75 Ted Turner Drive, SW
Suite 600
Atlanta, GA 30303

U.S. Department of Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Wells Fargo Bank
P.O. Box 10335
Des Moines, IA 50306

Becket and Lee, LLP
PO Box 3001
Malvern, PA 19355

Abrey Leahong
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Africa Williams
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Aida Simmons
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Aisha Taliaferro
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Alexis King
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Ameera Brewer
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Angela Milner
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Belinda Harris
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Brittany Walker
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Crystyona Hartzog
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Diana Smith
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Ebony Mayfield
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Ellilandria Griffin
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Jammie Parker
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Jenisee Long
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Jennifer Ridley
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Jessica Chatman
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Jocelyn Johnson
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Keesha Weems
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Kitrea Jackson
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Lakeisha Fenner
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Lygia Simmons
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Marai Kahey
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Marleka Williams
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Marquesha Holmes
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Marsha Taylor
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Montoya Minnis
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Netonia Bell
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Porshe Darden
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Princess Callahan
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Queen Lewis
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Quina Dopoe
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Rasheedah Mays
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Ronika Jones
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Sasha Hollins
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Seleta Stanton
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Shadana Deleston
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Shakir Williams
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Shanice Bain
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Shanrika Duhart
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Shaw Taylor
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

Tania Ramessar
c/o Astrid Evelyn Gabbe, Esq.
P.O. Box 4216
Hollywood, FL 33083

This 2nd day of November 2022.

Respectfully submitted,
McBRYAN, LLC

/s/Louis G. McBryan

Louis G. McBryan, Georgia Bar No. 480993
6849 Peachtree Dunwoody Rd
Building B-3, Suite 100
Atlanta, GA 30328
Telephone (678) 733-9322
Fax (678)498-2709
lmcbryan@mcbryanlaw.com
Attorneys for Debtor